

# **Exhibit C**

**From:** Ian Dew <idew@steckconsulting.com>  
**Sent:** Monday, March 10, 2008 11:03 AM  
**To:** Kris Knerr <Kknerr@MSLC.COM>  
**Subject:** RE: State Medicaid claims  
**Attach:** 20080229 Steck AWP Claims.xls

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Kris,

We have data for those rows in the attached spreadsheet in which the entry in column B are black. The states are listed in order of utilization of relevant Abbott NDCs over the period 1991-2001. I don't expect we'll receive data from additional states in time to produce it to Abbott.

We will be producing the CMS SMRF/MAX data, which covers all states (except perhaps Arizona) in recent years. To the extent Professor Duggan uses that data, it probably makes sense to prioritize methodologies in the order the states are listed.

--

Ian M. Dew Steck Consulting, LLC v:202.887.0192 f:202.887.0193  
1730 Rhode Island Ave, NW Suite 507 Washington, DC 20036  
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-----Original Message-----

From: Kris Knerr [mailto:Kknerr@MSLC.COM]  
Sent: Wednesday, March 05, 2008 12:31 PM  
To: idew@steckconsulting.com  
Subject: Re: State Medicaid claims

thanks

>>> <idew@steckconsulting.com> 3/5/2008 12:20 PM >>>

Kris,

I'm out of the office until Monday. If I have a copy of the list on my laptop, I'll email it to you this pm.

Ian M Dew  
Steck Consulting, LLC  
202-887-0192

-----Original Message-----

**EXP USABT-DUG 147477**

From: "Kris Knerr" <Kknerr@MSLC.COM>  
Subj: State Medicaid claims  
Date: Wed Mar 5, 2008 10:16 am  
Size: 233 bytes  
To: "Ian Dew" <idew@steckconsulting.com>

Ian,

In yesterday's call, it was mentioned that we have Medicaid claims data for about 15 states. Can you send me a listing of states that we have data for or expect to receive in time to utilize in the Abbott case?

Thanks,  
Kris

**EXP USABT-DUG 147478**

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	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
1																
2																
3																
4																
5																
6	Abbott SDUD Rank	Data Source	NDC	Jcode	Formulary	Medicare	NDC	J Code	Medicare	Direct	Indirect	Other	First	Last	Documentation	Gaps
7	1	Florida	X										1993	2005	yes	no
8	1	Florida		X											yes	unknown
9	2	Illinois	X										1991	2007	yes	no
10	2	Illinois		X									1997	2007	yes	no
11	3	California	X	(Abbott, Dey, Roxane only)									1994	2001	yes	no
12	4	Indiana	X	(Abbott-only dataset)									2000Q4	2001		
13	4	Indiana		X	(Abbott-only dataset)								2000Q4	2001		
14	5	Kentucky	X										1995	2005	no	no
15	5	Kentucky		X									1995	2005	no	no
16	5	Kentucky				X							1993	2004	no	no
17	6	Missouri	X	(Abbott and Roxane only)									1998	2008	yes	unknown
18	7	New York*	X	(Abbott, Dey, Roxane only)									1993	2007	yes	no
19	8	Ohio	X	(Abbott-only dataset)									1990	2007	yes	no
20	8	Ohio	X										2000	2005	yes	unknown
21	9	New Jersey	X										1991	2008	yes	no
22	9	New Jersey		X									1991	2008	yes	no
23	10	Michigan			X											
24	10	Michigan	X	(see Note 1)									2000	2006	yes	no
25	11	Louisiana	X										1995	2007	yes	no
26	11	Louisiana		X									1995	2007	yes	no
27	12	North Carolina	X										2001	2007	yes	unknown
28	13	Wisconsin	X										1992	2005	yes	unknown
29	13	Wisconsin	X	(Senior care claims)									2002	2005	yes	unknown
30	13	Wisconsin		X									1992	2005	yes	unknown
31	14	Washington														
32	15	Pennsylvania	X	(MAMIS system claims)									1998	2000?		
33	15	Pennsylvania	X	(PROMISE system claims)									2000	2007	yes	unknown
34	16	Tennessee														
35	17	Virginia	X													
36	17	Virginia		X												
37	18	Texas	X										1996	2006	yes	no
38	18	Texas			X								1974	2007	yes	no
39	19	Georgia														
40	20	Arkansas														

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	Q	R	S	T	U	V
1						
2						
3						
4						
5						
6	More years possible	M&S methodology	Provided for defendants or ETA	Last action	Next Action	Priority
7	unknown	yes	20071127	produced	analyze	
8	unknown	no	?	loaded	convert/canonicalize	low?
9	no	yes	20071127	produced	analyze	
10	no	no	20071127	produced	analyze	
11	no	yes	20071002 (Abbott)	produced Abbott	subset Dey/Roxane	
12		yes	20080303	canonicalized	produce Abbott	
13		no	20080303	canonicalized	produce Abbott	
14	no	yes	20071210	produced	analyze	
15	no	no	20071210	produced	analyze	
16	no	-	20071210	produced	analyze	
17	unknown	yes	20080218 (Abbott)	produced Abbott	produce Roxane	
18	no	yes	20071002 (Abbott)	produced Abbott	subset Dey/Roxane	
19	no	yes	20071219	produced Abbott	analyze	
20	no	yes	20080303	subsetting	produce Dey/Roxane	
21	no	yes	20080303	subsetting	produce	
22	no	yes	20080303	subsetting	produce	
23		-	20071016 (Abbott) & 20071127 (Dey/Roxane)	produced	analyze	
24	no	yes	20071127	produced	analyze	
25	no	yes	20071210	produced	analyze	
26	no	no	20071210	produced	analyze	
27	no	yes	20071016 (Abbott)	produced Abbott	subset Dey/Roxane	
28	no	yes	20080218 (Abbott)	produced Abbott	produce Dey/Roxane	
29	no	yes	20080218 (Abbott)	produced Abbott	produce Dey/Roxane	
30	no	no	20080218 (Abbott)	produced Abbott	produce Dey/Roxane	
31		yes	?			
32		yes	20080310	canonicalized	produce	
33	yes	yes	20080310	canonicalized	produce	
34		yes	?			
35		yes	?	loaded	clarify issues	
36		no	?	loaded	clarify issues	
37	yes?	no	20080218 (Abbott)	produced (Abbott)	produce Dey/Roxane	
38	no	-	?	loaded	canonicalize	
39		yes	?			
40		yes	?			

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
3			Data Type													
4			Claims				Aggregate Claims									
5			Medicaid				Medicaid			Transactions			Date Range			
	Abbott SDUD Rank	Data Source	NDC	Jcode	Formulary	Medicare	NDC	J Code	Medicare	Direct	Indirect	Other	First	Last	Documentation	Gaps
41	21	Maryland														
42	22	Alabama														
43	23	South Carolina														
44	24	Colorado														
45	25	Minnesota														
46	26	Connecticut	X										1991	2006	yes	no
47	27	Mississippi														
48	28	Oregon														
49	29	Utah	X										1998	2007	partial	unknown
50	29	Utah			X								1964	2007	partial	unknown
51	30	Oklahoma														
52	31	Massachusetts											1996	2008		
53	32	Iowa														
54	33	Kansas														
55	34	Nebraska														
56	35	West Virginia														
57	36	Nevada														
58	37	South Dakota														
59	38	Montana														
60	39	Idaho														
61	40	Hawaii	X										2001	2006	no	unknown
62	40	Hawaii			X										no	unknown
63	41	Rhode Island														
64	42	Delaware	X										sample			
65	43	Maine														
66	44	North Dakota														
67	45	Wyoming														
68	46	New Hampshire														
69	47	Vermont														
70	48	New Mexico														
71	49	District of Columbia														
72	50	Alaska	X	(two datasets)									1996	2003/2006	no	unknown
73	51	CMS MSIS	X										1999	2004	yes	yes
74	51	CMS SMRF/MAX	X										1991	2003	yes	no
75	51	CMS SDUD					X									
76	51	CMS NCH				Carrier							1991	2005	yes	unknown

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	Q	R	S	T	U	V
3						
4						
5						
6	More years possible	M&S methodology	Provided for defendants or ETA	Last action	Next Action	Priority
41		yes	?			
42		yes	?			
43		yes	?			
44		no	?			
45		yes	?			
46	no	yes	20080218 (Abbott)	produced Abbott	produce Dey/Roxane	
47		no	?			
48		yes	?			
49	no	no	20080310	canonicalized	subset	
50	no	-	20080310	canonicalized	subset	
51		no	?			
52		yes	20080317	canonicalized	subset	
53		no	?			
54		yes	?			
55		no	?			
56		yes	?			
57		yes	?			
58		no	?			
59		yes	?			
60		no	?			
61	yes	no	20080317	loaded	canonicalize	
62	unknown	-	20080317	loaded	canonicalize	
63		no	?			
64		no	?			
65		yes	?			
66		no	?			
67		no	?			
68		yes	?			
69		no	?			
70		yes	?			
71		no	?			
72	unknown	no	20080317	loaded	canonicalize	
73	yes	-	20080317	loaded	convert/canonicalize	priority 2
74	no	-	20080317	loaded	convert/canonicalize	priority 1
75		-	N/A			
76	no	-	20071210 & 20080218 (Abbott)	produced	analyze & reproduce Dey/Roxane	

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	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
3		Abbott SDUD Rank	Data Type													
4			Claims				Aggregate Claims									
5			Medicaid				Medicaid			Transactions			Date Range			
6			NDC	Jcode	Formulary		NDC	J Code		Direct	Indirect	Other	First	Last	Documentation	Gaps
		Data Source														
77	51	CMS NCH				DME							1991	2005	yes	unknown
78	51	CMS NCH				Outpatient							1991	2005	yes	unknown
79	51	CMS PSPS							X				1991	2004	yes	no
80	51	Cardinal									X		1995	2005	in transcript	unknown
81	51	McKesson									X		?	?	in transcript	unknown
82	51	Redbook			X								1996	2002	no	yes
83	51	First DataBank			X								1994	2004	yes	no



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	Q	R	S	T	U	V
3						
4						
5						
6	More years possible	M&S methodology	Provided for defendants or ETA	Last action	Next Action	Priority
77	no	-	20071210 & 20080218 (Abbott)	produced	analyze & reproduce Dey/Roxane	
78	no	-	20071210 & 20080218 (Abbott)	produced	analyze & reproduce Dey/Roxane	
79	unknown	-	20071104	produced	N/A	
80	no	-	20080317	subsetting	produce	
81	no	-	20080317	loaded	canonicalize	
82	yes	-	no need to produce		download	
83	unknown	-	20071104	produced	N/A	